# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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The STATE of TEXAS, et al.,

Plaintiffs,

v.

Civil Action No. 3:22-cv-00780-M

JOSEPH R. BIDEN JR., in his official capacity as President of the United States, *et al.*,

Defendants.

# JOINT STATUS REPORT REGARDING JURISDICTIONAL DISCOVERY

Pursuant to the Court's Order of August 22, 2022, ECF No. 50, the parties<sup>1</sup> jointly provide the Court with an update on the status of jurisdictional discovery.

Since the last update to the Court, the parties have engaged in further discussions and have confirmed the scope of Plaintiff's challenge to the CAM program and what type of information will be sought in jurisdictional discovery. The parties plan to simultaneously serve their written discovery requests on March 1, 2023.

In light of this activity, the parties respectfully request that the Court continue the stay governing this matter and continue to hold all pending deadlines in abeyance. The parties will file a joint status report providing a further update on the progress of jurisdictional discovery on or by March 15, 2023.

<sup>&</sup>lt;sup>1</sup> Pla intiff State of Arizona will soon be withdrawing from this case and does not join in this report.

Dated: February 15, 2022 Respectfully submitted,

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# **Certificate of Service**

On February 15, 2023, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Joseph A. Darrow
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U.S. Department of Justice